

Robert J. Tolchin

From: Hill, Brian <BHill@milchev.com>
Sent: Friday, October 05, 2012 3:41 PM
To: Robert Tolchin; Hibey, Richard
Cc: Rochon, Mark; dschoen593; M Haller
Subject: RE: Sokolow

Bob,

I write in response to your email below regarding Defendants' response to Request 30 of Plaintiffs' 7th RPD.

I have not been closely involved in the *Klieman* matter, but have looked into this and can tell you that no "PA Martyr Forms and Files" or "PLO Martyr Files" were produced or disclosed by the Defendants in the *Klieman* case.

It appears to me that a "PA Prisoner Form[] and File[]" (as you have defined that term) pertaining to a prisoner in the custody of the Israeli Prison Service whose I.D. No. the *Klieman* Plaintiffs indicated is 907949648 and to whom the *Klieman* Plaintiffs ascribed the following list of potential names: Annan Aziz Salim Hashash a.k.a. Annan Abdul Aziz al-Rimawi a.k.a. Annan Salim a.k.a. Ahmad Abdul Khader Ibrahim Salim a.k.a. Abdul Aziz Salim (hereinafter "Mr. Hashash") was produced by the Defendants in the *Klieman* case. However, because Mr. Hashash is not alleged to have any connection to any of the attacks at issue in the *Sokolow* case, we will be standing on our objections with regard to the production of those documents in the *Sokolow* matter.

For the record, I also disagree that we have engaged in "repeated dilatory abuses" or that "our meet and confer obligations" will be "exhausted" if we should ever fail to provide you with what you consider "a prompt, substantive reply" to an email you send to us.

Please let me know if you wish to confer about any other aspect of Defendants' response to Request 30 of Plaintiffs' 7th RPD.

Regards,

Brian A. Hill
Miller & Chevalier Chartered
655 Fifteenth Street, N.W. Suite 900
Washington, DC 20005-5701
Business: (202) 626-6014
Facsimile: (202) 626-5801

From: Robert Tolchin [<mailto:rjt.berkman@gmail.com>]
Sent: Friday, October 05, 2012 9:37 AM
To: Hill, Brian; Hibey, Richard

Cc: Rochon, Mark; dschoen593; M Haller

Subject: Sokolow

Brian -

We intend to seek relief from the Court regarding defendants' refusal to produce any documents in response to Request 30 of Plaintiffs' 7th RPD, unless defendants agree to make a satisfactory production without involving the Court. In this regard, please advise immediately whether defendants will produce the PA Martyr Forms and Files, PA Prisoner Forms and Files and PLO Martyr Files produced and/or disclosed by them in the *Klieman* case. Absent your agreement to do so, we will seek appropriate relief.

- Bob

P.S. Please note that, because of repeated dilatory abuses on your part, we are no longer going to send you repeated emails and reminders on the same request or topic; rather, we will ask *once*, and if we do not receive a prompt, substantive reply, we will consider our meet and confer obligations exhausted and proceed to seek appropriate relief.